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II. BASIS FOR REMOVAL

2. This Court has original jurisdiction over this State Court Action, pursuant to 28 U.S.C. §1332(a), because it is a civil action between citizens of different states where the matter in controversy exceeds the sum or value of \$75,000.00, exclusive of interest and costs.

3. The Plaintiffs seek monetary relief between \$250,000 and \$1,000,000. *See* Exhibit “C” at paragraph II, page 1. Accordingly, the amount in controversy in this matter meets and exceeds the federal jurisdictional minimum of \$75,000, exclusive of interest and costs.

4. Plaintiff is a Texas religious non-profit corporation with its principal place of business located in Hurst, Texas. *See* Exhibit “C” at paragraph 3, page 1.

5. Defendant, United Fire and Casualty Company at the time of the filing of this action, at the time of this removal, at all relevant times since and is currently, a citizen of the State of Iowa because it is an Iowa corporation with its principal place of business in the State of Iowa.

7. Because the amount in controversy exceeds \$75,000 and Plaintiff is a citizen of Texas while Defendant is a citizen of Iowa, this Court has original jurisdiction over the present action pursuant to 28 USC §1332. Therefore, removal is proper.

8. This action may be removed to this Court pursuant to 28 USC §1441(a), which allows for the removal of any civil action brought in the state court of which the District Courts of the United States have original jurisdiction, by the defendant or the defendants, to the District Court of the United States for the district and division embracing the place where such action is pending.

9. This Notice of Removal is filed within thirty (30) days after service (on April 19, 2021) by Defendant of the State Court Action. This Notice of Removal has also been filed within one year of the filing of Plaintiff’s Original Petition by which the State Court Action was commenced. This Notice, therefore, if timely filed pursuant to 28 USC §1446 (b).

**III.
PROCEDURAL REQUIREMENTS**

10. In accordance with 28 USC section 1446 (D), Defendant will promptly give written notice of this Notice of Removal to Plaintiff through counsel of record and file a copy of this Notice of Removal in the 141st Judicial District Court, Tarrant County, Texas.

11. Defendant reserves the right to amend or supplement this Notice of Removal.

12. The following are included in the Index filed contemporaneously with this Notice of Removal:

Exhibit “A”: An index of all documents that clearly identifies each document and indicates the date the document was filed in the State Court action.

Exhibit “B”: Civil Docket Sheet

Exhibit “C”: Plaintiff’s Original Petition

Exhibit “D”: Citation to United

Exhibit “E”: United’s Original Answer

Exhibit “F”: United’s Jury Demand

Exhibit “G”: Curnutt Vacation Letter to Court

Exhibit “H”: State Court Notice of Removal

For the above reasons, Defendant gives notice of the removal of the State Court Action to this Court and respectfully requests that this action proceed before this Court as though it had originally been instituted in this Court.

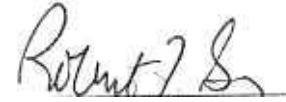
Dated: May 17, 2021.

Respectfully submitted,

BROCK ♦ GUERRA
STRANDMO DIMALINE JONES, P.C.

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By:



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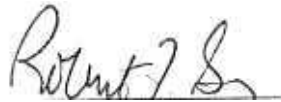
ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above and foregoing document has been forwarded to the following counsel of record in compliance with the Federal Rules of Civil Procedure this 17th day of May, 2021:

Kelly Curnutt
Cash H. Barker
Curnutt Hafer, L.L.P.
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Arlington, Texas 76010

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